

Approved: \_\_\_\_\_

SAM ADELSBERG / MATTHEW J.C. HELLMAN  
Assistant United States Attorneys

Before: HONORABLE SARAH L. CAVE  
United States Magistrate Judge  
Southern District of New York

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: **COMPLAINT**  
UNITED STATES OF AMERICA  
: Violations of 18 U.S.C.  
- v. - : §§ 875, 115, and 2.  
: ISAAC ABERGEL, COUNTY OF OFFENSE:  
: NEW YORK  
Defendant.  
----- X

SOUTHERN DISTRICT OF NEW YORK, ss.:

DANIEL SMITH, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and a member of the FBI's Joint Terrorism Task Force ("JTTF"), and charges as follows:

**COUNT ONE**

**(Threatening Interstate Communications)**

1. In or about February 2020, in the Southern District of New York and elsewhere, ISAAC ABERGEL, the defendant, knowingly transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, ABERGEL sent multiple death threats via a social media platform (the "Social Media Platform") ordering others to kill federal agents, judges, and employees of the Social Media Platform.

(Title 18, United States Code, Sections 875(c) and 2.)

**COUNT TWO**

**(Threatening to Murder Federal Law Enforcement Officers and Judges)**

2. In or about February 2020, in the Southern District of New York and elsewhere, ISAAC ABERGEL, the defendant, did

threaten to murder federal law enforcement officers and judges, with intent to impede, intimidate, and interfere with such federal law enforcement officers and judges while they were engaged in the performance of their official duties, to wit, ABERGEL sent death threats via the Social Media Platform ordering others to kill federal agents and federal judges.

(Title 18, United States Code, Sections 115(a)(1)(B) and 2.)

The bases for my knowledge and the foregoing charges are, in part, as follows:

3. I am a Special Agent with the FBI and a member of the FBI's New York-based JTTF, and I have been personally involved in the investigation of this matter. This affidavit is based in part upon my conversations with law enforcement agents and other people, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all of the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

4. Based on my involvement in this investigation and my review of messages posted on the Social Media Platform, including messages compiled by a third party entity that captures information posted on the Social Media Platform, I know, among other things, that on or about February 27, 2020, a user of the Social Media Platform with the account name @iceakk (the "Account"), sent a number of threatening public-facing messages. For example, the user of the Account sent the following messages:

a. "i order ms13 to kill everyone that works at [the Social Media Platform] send their bodies to their family chopped into pieces"

b. "you better get youngboy out of this or I will kill every fed in this country right now"

c. "i will kill every fbi agent and every cop every judge mass shooting in every city"

d. "every member of the bloods to start going on killing sprees start killing feds"

e. "i order you to kill every federal judge and every federal cop in this country"

f. "i wanna go to the federal building and do a mass shooting"

g. "#fbi if you try to stop my gang from killing [Social Media Platform] employees or judges i will get all my gangs to do mass shootings across the country at every police station and federal building and every federal worker will have their families killed and sent to them in pieces in a body bag"

h. "#msl3 #judge #fbi attention fbi you know who this is if you want war with me and my woo you better get youngboy out of this or I will kill every fed in this country right now. Free Youngboy never broke again now and drop all weapons charges or i will make every msl3 kill ya'il"

i. "@[Social Media Platform] @FBI i come from the largest crime family in the world i run every gang and the head of the departments all know who i am. If you dont do as i say i will get every gang member and mafia cartels to kill you and your families must do as i say always or else you'll be dead"

j. "these last few weeks lets just say arent my weeks man lots of shit pop smoke dead now youngboy charge all this shit is making me lose my mind i wanna kill someone right now i feel like killing these feds they arent on my side when they do shit like this @FBI #msl3 kill the feds"

5. Based on my review of records provided by the Social Media Platform, I know, among other things, the following:

a. Upon opening the Account, the subscriber of the Account provided the Social Media Platform with a specific telephone number (the "Account Number").

b. The Account was created by a user with a specific I.P. address (the "Account I.P. Address") controlled by a specific internet service provider (the "Internet Service Provider").

6. Based on my review of records provided by the Internet Service Provider, I know, among other things, the following:

a. The Account I.P. address resolves to a specific address in Brooklyn, New York ("Address-1").

7. Based on my review of a July 2019 FBI report (the "FBI Report"), I know, among other things, the following:

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defendant, called an FBI hotline to report a crime. During the call, ABERGEL provided the FBI with certain personal identifying information, including his phone number and address. The phone number ABERGEL provided is the Account Number and the address ABERGEL provided is an address immediately adjacent to Address-1.<sup>1</sup>

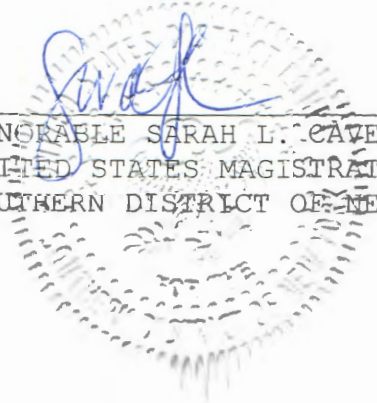

8. I reviewed the messages posted on the Social Media Platform by ISAAC ABERGEL, the defendant, while in the Southern District of New York.

WHEREFORE, your deponent respectfully requests that a warrant be issued for the arrest of ISAAC ABERGEL, the defendant, and that he be arrested and imprisoned, or bailed, as the case may be.



Special Agent Daniel Smith  
Federal Bureau of Investigation  
Joint Terrorism Task Force

Sworn to before me this  
28th day of February, 2020



HONORABLE SARAH L. CAVE  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK

<sup>1</sup> Based upon my training, experience, and involvement in this investigation, I know that individuals will often connect to the Internet by using an I.P. address belonging to a neighbor.